

MAMIE B. LAMBERT,
Complainant,
VS.
GEORGE M. LAMBERT,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.

This cause coming on to be heard was submitted upon the original Bill of Complaint on behalf of the Complainant, Answer and Waiver of the Respondent, and Testimony as noted by the Register, and the Court, after due consideration, is of the opinion that the Complainant is entitled to the relief prayed for.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED by the Court that the bonds of matrimony heretofore existing between the Complainant and the Respondent be, and the same are hereby dissolved, and the Complainant is forever divorced from the Respondent on the ground of cruelty.

IT IS FURTHER ORDERED that the Complainant and the Respondent be, and they are hereby permitted to again contract marriage upon the payment of the costs in this cause.

IT IS FURTHER ORDERED that the Respondent pay the costs herein taxed, for which execution may issue.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the said MAMIE B. LAMBERT shall not again marry, except to the said GEORGE M. LAMBERT, until sixty days after this date, and that if an appeal is taken within sixty days, she shall not again marry, except to the said GEORGE M. LAMBERT, during the pendency of the appeal.

19th Dated at Monroeville, Monroe County, Alabama, this day of March, 1936.

J. W. Hare
Judge of the Circuit Court of
Baldwin County, Alabama.

The State of Alabama }
Baldwin County

Circuit Court of Baldwin County, Alabama,
(In Equity)

MAMIE B. LAMBERT

COMPLAINANT

VS.

GEORGE M. LAMBERT

RESPONDENT

I, Robert A. Duck

as Register and Commissioner

have called and caused to come before me Mamie B. Lambert
and Edna Herron

witnesses named in the requirement for Oral Examination, on the 16 day of Mar.
1936, at the office of _____

in Bay Minette, Alabama, and having first sworn said witnesses to speak the
truth, the whole truth, and nothing but the truth, the said _____

doth depose and say as follows:

My name is Mamie B. Lambert. I am over twenty-one years of age and a resident of Bay Minette, Baldwin County, Alabama, where I have resided all my life. George M. Lambert and I were married at Brewton, in Escambia County, Alabama, on to-wit, July 31st, 1922, and lived together as husband and wife until on to-wit, October 15th, 1935. On and prior to October 15th, 1935, the Respondent threatened, abused and mistreated me. This condition grew worse from time to time, until I found that we could no longer live together as man and wife. His conduct was such that I had every reasonable apprehension to believe, and did actually believe that if I should continue to live with him, he would carry out his threats and do actual violence to my person, which would endanger my life and health. We tried to get along and live together as husband and wife, but it was impossible.

Mamie B Lambert

EDNA HERRON, a witness for the Complainant, being first duly sworn, deposes and says:

My name is Edna Herron. I live at Bay Minette, in Baldwin County, Alabama. I am personally acquainted with Mamie B. Lambert and George M. Lambert, both of Bay Minette, Alabama. I have known them for the past five or six years or more. They have not lived together as husband and wife since October 15, 1935. The conduct of the Respondent, George M. Lambert, was such that it was impossible for him and Mamie B. Lambert to live together as husband and wife. I have been around with them quite a bit and the Respondent was quarrelsome and very fussy toward the Complainant.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.

MAMIE B. LAMBERT,
Complainant,
VS.
GEORGE M. LAMBERT,
Respondent.

TO HONORABLE F. W. HARE, JUDGE OF THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA, IN EQUITY:

Comes your Complainant, MAMIE B. LAMBERT, and humbly complaining against the Respondent, GEORGE M. LAMBERT, respectfully represents and shows unto your Honor and this Honorable Court as follows:

FIRST:

That both your Complainant and the Respondent are bona fide residents of Baldwin County, Alabama, over twenty-one years of age.

SECOND:

That the Complainant and the Respondent were married at Brewton, in Escambia County, Alabama, on to-wit, July 31st, 1922, and lived together as husband and wife in Bay Minette, Baldwin County, Alabama, until on to-wit, October 15th, 1935.

THIRD:

That on to-wit, October 15th, 1935, and various dates prior thereto, the Respondent threatened, abused and mistreated the Complainant; that his conduct was such that the Complainant had every reasonable apprehension to believe, and she did actually believe, that the Respondent would carry out his threats and do actual violence to her person, which would necessarily endanger her life and health should she continue to live with him. WHEREFORE, the premises considered, Complainant prays that your Honor will, by proper process, make the said GEORGE

M. LAMBERT party respondent to this Bill of Complaint, requiring him to plead, answer or demur to the same within the time and under the penalties prescribed by law and the practice of this Honorable Court.

PRAYER FOR RELIEF:

Complainant further prays that upon a final hearing of this cause your Honor will make and enter an order and decree forever barring the bonds of matrimony existing between her and the Respondent, GEORGE M. LAMBERT, and that your Honor will give and grant unto her such other, further, different or general relief as she may be in equity and good conscience entitled to receive, and as in duty bound she will ever pray.

Memie B Lambert
Complainant.

Beale Hae
Solicitors for Complainant.

FOOT NOTE:

The Respondent, GEORGE M. LAMBERT, is required to answer each and every allegation contained in the foregoing bill of complaint, in paragraphs First to Third, inclusive, but not under oath, oath being hereby expressly waived.

Memie B Lambert
Complainant.

Beale Hae
Solicitors for Complainant.

MAMIE B. LAMBERT,

Complainant,

VS.

GEORGE M. LAMBERT,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

Comes the Respondent in his own proper person and waives notice of the taking of testimony on behalf of the Complainant; the right to cross-examine witnesses for the Complainant, and agrees that this matter be submitted for final decree forthwith, without further notice.

George M. Lambert
Respondent.

WITNESS:

The State of Alabama, }
Baldwin County } Circuit Court of Baldwin County, In Equity

To Any Sheriff of the State of Alabama—GREETING:

WE COMMAND YOU, That you summon GEORGE M. LAMBERT

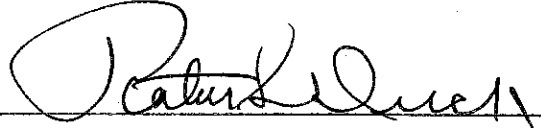
of BALDWIN County, to be and appear before the Judge of the Circuit Court of Baldwin County, exercising Chancery jurisdiction, within thirty days after the service of Summons, and there to answer, plead or demur, without oath, to a Bill of Complaint lately exhibited by

MAMIE B. LAMBERT

against said GEORGE M. LAMBERT

and further to do and perform what said Judge shall order and direct in that behalf. And this the said Defendant shall in no wise omit, under penalty, etc. And we further command that you return this writ with your endorsement thereon, to our said Court immediately upon the execution thereof.

WITNESS, Robert S. Duck, Register of said Circuit Court, this 10th day of March 1936

 Register

N. B.—Any party defendant is entitled to a copy of the bill upon application to the Register.

RECORDED

MAMIE B. LAMBERT,

Complainant,

VS.

GEORGE M. LAMBERT,

Respondent.

) IN THE CIRCUIT COURT OF

) BALDWIN COUNTY, ALABAMA,

) IN EQUITY.

Comes the Respondent and for answer to the Complainant's Bill of Complaint and to each count thereof, separately and severally, says:

ONE:

That he admits the allegations contained in paragraphs First and Second.

TWO:

That he denies the allegation contained in paragraph Third and demands strict proof of the same.

George M. Lambert
Respondent.

WITNESSES:

this Honorable Court.

And your complainant prays that upon the final hearing of this cause, this Honorable Court will grant unto him an absolute divorce, dissolving entirely the bonds of matrimony now existing between him and Frances G. Hobbs and granting him the right to marry agains and your complainant prays for such other and further relief as in Equity and good conscience he may be entitled to in the premises for which he will ever pray.

David M. Brown
SOLICITOR FOR COMPLAINANT

FOOT NOTE

The respondent is required to answer, but not under oath, the same being hereby expressly waived, as to each and every paragraph on the foregoing Bill of Complaint.

David M. Brown
SOLICITOR FOR COMPLAINANT.

IN EQUITY NO. 49

COMPLAINANT

FRANCIS G. HOBBS

RESPONDENT

AP.

DAVID M. BROWN

TO THE CIRCUIT COURT OF
MIDDLESEX COUNTY, MICHIGAN

DAVID M. BROWN

Special Agent in Charge
District for Complainant
Davis M. Brown

The State of Alabama, }
Baldwin County

CIRCUIT COURT

To MARGUERITE MIDDLETON;

KNOW YE: That we, having full faith in your prudence and competency, have appointed you Com-

missioner, and by these presents do authorize you, at such time and place as you may appoint, to call before you

and examine William W. Hobbs, J. C. Marshall, and F. Riggs

as witnesses in behalf of Complainant in a cause pending in our Circuit

Court of Baldwin County, of said State, wherein WILLIAM W. HOBBS is

Complainant

and

FRANCIS G. HOBBS

Defendant,

on oath to be by you administered, upon oral examination

to take and certify the deposition of the witness and return the same to our Court, with all convenient

speed, under your hand.

Witness 22nd day of April 19 36

Robert A. Brock

REGISTER

COMMISSIONER'S FEE, \$ 5.00

WITNESS' FEES, \$ None.

202

THE STATE OF ALABAMA,

Baldwin County.

No. 202

Circuit Court, In Equity

WILLIAM W HOBBS.

Complainant

VS.

FRANCIS G HOBBS.

Defendant

This cause, coming on to be heard at this Term, was submitted upon the Bill of Complaint, decree pro confesso and the testimony as noted by the Register; and, upon consideration thereof, the Court is of opinion that the Complainant is entitled to the relief prayed for in said bill.

IT IS THEREFORE Ordered, adjudged and decreed by the Court, that the bonds of matrimony heretofore existing between the Complainant and Defendant be, and the same are hereby dissolved, and the Complainant is forever divorced from the Defendant.

On Account of Voluntarily Abandonment.

It is further ordered that the said WILLIAM W HOBBS.

be, and he is hereby permitted to again contract marriage, upon the payment of the costs of Court in this cause.

It is further ordered, that the said WILLIAM W HOBBS.

pay the costs herein taxed, for which execution may issue, and if such execution is returned, no property found, then execution for such costs may be issued against the said

It is further ordered, adjudged and decreed that said WILLIAM W HOBBS.

shall not again marry except to said FRANCIS G HOBBS.

until sixty days after this date, and that if an appeal is taken within sixty days he shall not marry

FRANCIS G HOBBS.

during the said pendency of appeal

This

21st

day of May

1936

[Handwritten Signature]

Judge of the Circuit Court of Baldwin County.

STATE OF ALABAMA,

Baldwin County.

Circuit Court, In Equity.

I, Robert S Duck.

Register of said Circuit Court of said County, Alabama, do hereby certify that the above is a full, true and correct copy of the decree rendered by

said Court on the day of May 1936 in the cause of

WILLIAM W HOBBS.

Complainant

VS.

FRANCIS G HOBBS.

Defendant

as appears of record in said Court.

Witness my hand and the seal of said Court, this the

day of May

1936

Register

WILLIAM W. HOBBS
Complainant,
VS.
FRANCES G. HOBBS,
Respondent.

IN THE CIRCUIT COURT OF BALDWIN COUNTY,
ALABAMA, IN EQUITY,
NO. _____.

TO THE HONORABLE JUDGE OF THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA, IN EQUITY.

Your complainant, William W. Hobbs, exhibits this, his Bill of Complaint against Frances G. Hobbs and respectfully shows unto your honor as follows:

That complainant has been a bona fide resident of the State of Alabama and Baldwin County for more than three years, next immediately preceeding the filing of this Bill of Complaint; that both the respondent and complainant are over the age of twentypone years and that complainant married respondent on or about March, 20th 1933 in the city of Milton Florida and that there is only one child the fruit of said marriage which is now with the respondent.

Complainant alleges and avers that the respondent lived with him as husband and wife from March 20th 1933 until about April 10th 1933, at which time the respondent voluntarily left the bed and board of your complainant without cause or fault on his part and has never returned to your complainant, nor cohabited with him as husband and wife from the tenth of April 1933 to the date of the filing of this bill. Said abandonment by respondent continuing for more than two years, next, preceding the filing of this bill.

The premises considered, complainant prays that said Frances G. Hobbs be made a party to this Bill of Complaint and that she be brought into Court by personal service by publication directing her to plead, answer or demur to the allegations as set out against her in said Bill of Complaint as filed in this cause in all respects as required by law and under the rules of

this Honorable Court.

And your complainant prays that upon the final hearing of this cause, this Honorable Court will grant unto him an absolute divorce, dissolving entirely the bonds of matrimony now existing between him and Frances G. Hobbs and granting him the right to marry again and your complainant prays for such other and further relief as in Equity and good conscience he may be entitled to in the premises for which he will ever pray.

Ami A. Brown
SOLICITOR FOR COMPLAINANT

FOOT NOTE

The respondent is required to answer, but not under oath, the same being hereby expressly waived, as to each and every paragraph on the foregoing Bill of Complaint.

Ami A. Brown
SOLICITOR FOR COMPLAINANT.

RECORDED & INDEXED
OFFICE FOR COMPLAINANT
CLARE E. BROWN

Ami A. Brown

BUTTERFIELD COUNTY, MISSISSIPPI
IN THE CIRCUIT COURT OF

BILL OF COMPLAINT

vs.

FRANCES G. HOBBS,

AR.

COMPLAINANT,

vs.

2:22
1923

TO BE FILED IN...

STATE OF ALABAMA,
Baldwin County.

}

CIRCUIT COURT, IN EQUITY.

No. March Term, ~~1935~~ 1936

Mamie B. Lambert , Complainant

vs.

George M. Lambert , Defendant

To Robert S. Duck , Register :

In the above stated cause a ^{*Answers Waiver*} ~~Decree Pro Confesso~~ ^{*filed by*} having been taken against the Defendant, and evidence having been taken, and the cause being ready for submission for final decree, and no defense having been interposed, the Complainant, by Beebe & Hall

..... Solicitors of record, now files with the Register of this Court this written request to deliver the papers in this cause to the Judge for final decree in vacation.

Beebe & Hall
.....
Solicitor for Complainant.

8581. NOTE OF TESTIMONY

MAMIE B. LAMBERT

vs.

GEORGE M. LAMBERT

THE STATE OF ALABAMA
Baldwin County

IN EQUITY
Circuit Court of Baldwin County

This cause is submitted in behalf of Complainant upon the original Bill of Complaint,
Testimony of Mamie B. Lambert and Edna Herron.

and in behalf of Defendant upon answer and waiver

Robert S. Duck
Register.

RECORDED
Book
6-322

No. _____

The State of Alabama
BALDWIN COUNTY

IN EQUITY
Circuit Court of Baldwin County

JAMIE B. LAMBERT

VS.

GEORGE W. LAMBERT

NOTE OF TESTIMONY

Filed in Open Court this 16th

day of March 1936

Robert S. Buck,
REGISTER

RECORDED
Book
6-322

No. Page

THE STATE OF ALABAMA
BALDWIN COUNTY
CIRCUIT COURT, IN EQUITY

Wmie P. Lambert

VS.

George W. Lambert

REQUEST FOR DECREE IN
VACATION

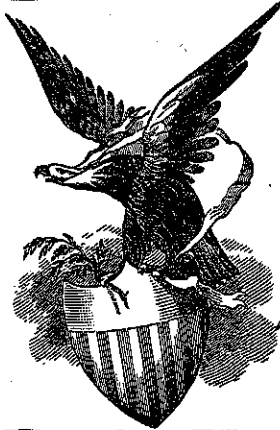
FILED *Mar. 16* 19*31*

Robert S. Duck
Register

RECORDED IN RECORD

VOL. PAGE

Register



May 31st 1936

Received from Erin M. Bram, et al
Five and 00/100 Dollars

Commission Fee in Hobbs vs. Hobbs

Moranville Middleton
Commissioner

#202

I, Robert S. Dick as Register and Commissioner hereby certify

that the foregoing deposition on Oral Examination was taken down in writing by me in the words

of the witness Mr. Dick and read over to Mr. Dick signed the same in the presence of

myself and ~~Mr. Dick~~

at the time and place herein mentioned; that I have personal knowledge of personal identity of said

witness Mr. Dick or had proof made before me of the identity of said witness; that I am not of

counsel or of kin to any of the parties to said cause, or any manner interested in the result thereof.

I enclose the said Oral Examination in an envelope to the Register of said Court.

Given under my hand and seal, this 16 day of March, 1936.

Robert S. Dick (R. S.)

No. _____ Page _____

**THE STATE OF ALABAMA,
BALDWIN COUNTY**

IN CIRCUIT COURT, IN EQUITY

COMPLAINANT

vs.

RESPONDENT

ORAL DEPOSITION

Filed Mar. 16, 1936

Robert S. Dick, Register

RECORDED IN _____
Record _____

Vol. _____ Page _____

Register _____

517053

RECORDED
2-196

FINAL DECREE OF DIVORCE.

MAMIE B. LAMBERT,
Complainant,

VS.

GEORGE M. LAMBERT,
Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.

FILED THIS 28 DAY OF FEBRUARY 1936
John H. Smith
Clerk-Register

RECORDED
Quick
6-37-1

BILL OF COMPLAINT.

MAMIE B. LAMBERT,

Complainant,

VS.

GEORGE M. LAMBERT,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.

Filed this 10th day Mar. 1936
Robert S. Quick
Clerk-Register

RECORDED
Duck
6-322

WAIVER:

MAMIE B. LAMBERT,

Complainant,

VS.

GEORGE M. LAMBERT,

Respondent.

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA,
IN EQUITY.

Filed Mar. 16, 1936

Robert S. Duck, Jr.

Register

RECORDED
Subs
6-321

Serve on GEORGE M. LAMBERT

Circuit Court of Baldwin County
IN EQUITY

No. 203

SUMMONS

~~XXXXXXXXXXXXXXXXXXXX~~

MAMIE B. LAMBERT,
Complainant,

vs.

GEORGE M. LAMBERT,
Respondent.

THE STATE OF ALABAMA,

BALDWIN COUNTY

Received in office this 18

day of March, 1936

Walter Williams
SHERIFF

Executed this 11th day of March 1936

by leaving a copy of the within Summons with

George M Lambert

Walter Williams
Defendant
Sheriff

By Lamine Barber
Deputy Sheriff

FREERE & HATT
Solicitor for Complainant

Recorded in Vol. _____ Page _____

RECORDED

Duck

6-321

ANSWER:

MAMIE B. LAMBERT,

Complainant,

VS.

GEORGE M. LAMBERT,

Respondent.

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA,

IN EQUITY.

Filed Mar. 16, 1936
Robert S. Duck,
Register

Copy

IN EQUITY NO. 202

WILLIAM W. HOBBS,
Complainant,

VS.

FRANCES G. HOBBS,
Respondent,

BILL OF COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA
FILED THIS 13th DAY OF March 1936
Paul S. Dues
Clerk-Register

Orvis M. Brown
Solicitor for Complainant
Robertsdale, Alabama

[Faint, mostly illegible text from the body of the bill of complaint, including what appears to be a signature and a date.]

NO.

The State of Alabama
BALDWIN COUNTY
CIRCUIT COURT

WILLIAM W. HOBBS

Complainant

vs.

FRANCES G. HOBBS

Defendant

COMMISSION TO TAKE DEPOSITION

COMMISSIONER:

MARGUERITE MIDDLETON

WITNESSES:

WILLIAM W. HOBBS

J. C. MARSHALL

E. RIGGINS.

Book
RECORDED

2-207

No. 202

THE STATE OF ALABAMA,
BALDWIN COUNTY

CIRCUIT COURT, IN EQUITY
Baldwin County, Ala.

WILLIAM W HOBBS.

VS.

FRANCIS G HOBBS.

DECREE OF DIVORCE

filed in office this

23

day of MAY 1936

Richard D. Duck
REGISTER

E. O. M.

MOORE PRINTING CO., BAY MINETTE, ALA.

IN EQUITY NO. 205

RECORDED

6-453

WILLIAM W. HOBBS,

Complainant,

VS.

FRANCIS G. HOBBS,

Respondent,

BILL OF COMPLAINT

IN THE CIRCUIT COURT OF
BALDWIN COUNTY, ALABAMA

Orville M. Brown
Clerk-Recorder

Orville M. Brown
Solicitor for Complainant
Robertsdale, Alabama

[Faint, mirrored text from the reverse side of the page, appearing as bleed-through.]